UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

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MAR 2 5 1993

REF: 4WD-SSRB

YELLOW

James C. Brown, Manager
Environmental Affairs Department
Olin Chemicals
Post Office Box 248
Charleston, Tennessee 37310

RE: Olin Corp./McIntosh Plant
Comments on the Remedial Technologies, Alternatives Screening Technical Memorandum

Dear Mr. Brown:

Please find enclosed EPA's comments on the Remedial Technologies, Alternatives Screening Technical Memorandum for the Olin/McIntosh Superfund Site. The comments are divided into two sections - General Comments and Specific Comments. Please provide a line-by-line response to each comment on or before close of business on April 5, 1993.

The Draft Feasibility Study (FS) will be due on or before May 5, 1993. Approval of this document will be based on the responses provided in your April 5, 1993 response to the enclosed comments. Upon review of your submittal, all approved comments are to be incorporated into the Draft FS.

If there are any questions regarding the enclosed comments, please give me a call at (404)347-2643.

Sincerely,

Cheryl W. Smith, RPM
Remedial Project Manager
South Superfund Remedial Branch

Enclosure

cc: Joe Downey, ADEM
Mark Meckes, START, ORD
Nancy Bethune, GWTSU

TECHNICAL REVIEW AND COMMENTS ON
REMEDIAL TECHNOLOGIES, ALTERNATIVE SCREENING
TECHNICAL MEMORANDUM

Olin Corporation
McIntosh, Alabama

3 8 1497

GENERAL COMMENTS

1. Evaluate Solvent Extraction as a technology as opposed to listing various vendors of solvent extraction equipment. The implication is that only the vendors listed have the capability of treating these wastes.

2. Solvent extraction will not be an effective mechanism for removing mercury unless the mercury is an organomercury compound. Therefore, if solvent extraction continues to be retained for future consideration, a treatability study must be conducted to determine its applicability to site-related wastes.

SPECIFIC COMMENTS

1. Page 4, Table and Figure 5. The table indicates that only one pond was clean closed. However, Figure 5 shows two brine filter backwash ponds. Please clarify.

2. Page 8, Paragraph 2. Include a map showing the locations of the off-facility ground water sampling locations in the Draft FS.

3. Page 18, Paragraph 1. The TCLP test is a regulatory test to determine if a solid waste is toxic enough to be considered a hazardous waste. It is not a leachability test to determine a constituent's potential to leach into the ground water. Another mechanism of determining the mobility of contaminants will be necessary in evaluating continuing sources.

4. Page 19, Paragraph 1. The same as Comment #3 above.

5. Page 27, Paragraph 2. Provide background data to support the 0.3 porosity value.

6. Page 28, Paragraph 4. Re-evaluation of the other SWMU's will be required if TCLP was utilized as the mechanism to determine if these units are continuing sources.

7. Page 29, Paragraph 2. Capping of contaminated areas may not preclude downward migration of contaminants. Contaminated soils with concentrations that exceed risk-based standards at the surface and subsurface concentrations which possess the potential to leach to the ground water must be addressed as potential sources.

8. Page 30, Last Paragraph. The presence of high concentrations of mercury in the landfill waste samples suggests the possible presence of D009 RCRA waste. Determination of the source of this contamination is crucial because the presence of a RCRA waste could possibly trigger Land Ban restrictions, treatment standards, and Best Demonstrated Available Technology (BDAT).

9. Pages 40 and 41. Further detail will be required in the Draft FS regarding well locations, number of wells proposed, treatment process(es) to be used, whether or not all wells will utilize the same treatment process(es), etc. These additional details will be required in the Draft FS.

   In addition, proposed technologies should evaluate the need to modify the current monitoring well sampling protocol; i.e., installation of off-facility wells.

10. Figure 3. This figure identifies contamination north of expected source areas. Provide an explanation, including identification of potential source areas, or if the contamination is present due to the influence of Ciba's withdrawal system.